

**MATTHEW WILSON and  
JOSHUA TATE, Individually and  
On Behalf of All Others Similarly Situated**

**V.**

**Defendant.**

[illegible]

**JOINT NOTICE REGARDING OPT-IN PLAINTIFF JUSTIN DOBBS' MOTION FOR  
ENTRY OF FINAL JUDGMENT AND AWARD OF ATTORNEYS' FEES**

**COME NOW** Opt-In Plaintiff Justin Dobbs (“Dobbs”) and Defendant Anderson Perforating, Ltd. d/b/a API Perforating (“Defendant” or “API”), (collectively, the “Parties”) by and through their respective attorneys, and file this Joint Notice Regarding Opt-In Plaintiff Justin Dobbs’ Motion for Entry of Final Judgment and Award of Attorneys’ Fees, and in support thereof, would respectfully show the Court as follows:

1. Defendant made a valid offer of judgment to Dobbs on or about June 14, 2013 in the amount of \$19,730.90, plus then-accrued costs and attorneys' fees.
2. Dobbs accepted Defendant's offer of judgment on or about June 28, 2013.
3. The Parties agree that the amount of attorneys' fees and costs to be paid by Defendant with respect to Dobbs' claims are as follows:

- Joint Notice Regarding Opt-In Plaintiff Justin Dobbs’  
Motion for Entry of Final Judgment and Award of Attorneys’ Fees**

4. Accordingly, the Parties request that the Court enter final judgment in favor of Dobbs in the amount of \$19,730.90 (less required withholdings), plus attorneys' fees in the amount of \$12,898.00.

Respectfully submitted,

By: /s/ John D. Smart  
**John D. Smart, Esq.**  
State Bar No. 18523310  
[jsmart@winstead.com](mailto:jsmart@winstead.com)  
**Marcus D. Brown, Esq.**  
State Bar No. 24050340  
[mbrown@winstead.com](mailto:mbrown@winstead.com)  
**Winstead P.C.**  
500 Winstead Building  
2728 N. Harwood  
Dallas, Texas 75201  
(214) 745-5400 - Telephone  
(214) 745-5390 - Facsimile

***ATTORNEYS FOR DEFENDANT***

By: /s/ Jeremi K. Young  
**Jeremi K. Young**  
State Bar No. 24013793  
**Rhonda Luginbyhl**  
State Bar No. 24074626  
**The Young Law Firm, P.C.**  
1001 S. Harrison, Suite 200  
Amarillo, Texas 79101  
(806) 331-1800  
(806) 398-9095 (fax)  
[jyoung@youngfirm.com](mailto:jyoung@youngfirm.com)

***ATTORNEYS FOR PLAINTIFFS***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served via ECF on all counsel of record in this matter on this 12th day of August, 2013.

/s/ John D. Smart  
John D. Smart